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FCC Mail Room

Annual 47 C.F.R. § 64.2009(e) CPNI Certification**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2013 covering the prior calendar year 2012

1. Date filed: 2/22/13
2. Name of company(s) covered by this certification: *Collins Communications, Inc.*
3. Form 499 Filer ID: 829038
4. Name of signatory: *Shane Miller*
5. Title of signatory: *Chief Operating Officer*
6. Certification:

I, Shane Miller certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

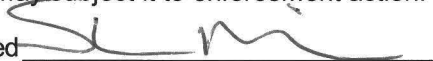
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company [*has not*] taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. [NOTE: If you reply in the affirmative, provide an explanation of any actions taken against data brokers.]

The company [*has not*] received customer complaints in the past year concerning the unauthorized release of CPNI [NOTE: If you reply in the affirmative, provide a summary of such complaints. This summary must include the number of complaints, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.]

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

*Shane Miller, Chief Operating Officer***Attachments:** Accompanying Statement explaining CPNI proceduresNo. of Copies rec'd
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COLLINS COMMUNICAITONS, INC's STATEMENT OF POLICY IN TREATMENT OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)

- 1) It is Collins Communications, Inc.'s (hereinafter referred to as "Collins Communications Inc.") policy not to use CPNI for any activity other than permitted by law. Any disclosure of CPNI to other parties (such as affiliates, vendors, and agents) occurs only if it is necessary to conduct a legitimate business activity related to the services already provided by Collins Communications Inc. to the customer. If Collins Communications Inc. is not required by law to disclose the CPNI or if the intended use does not fall within one of the carve outs, Collins Communications Inc. will first obtain the customer's consent prior to using CPNI.
- 2) Collins Communications, Inc. follows industry-standard practices to prevent unauthorized access to CPNI by a person other than the subscriber or Collins Communications, Inc. However, Collins Communications, Inc. cannot guarantee that these practices will prevent every unauthorized attempt to access, use, or disclose personally identifiable information. Therefore:
 - a) If an unauthorized disclosure were to occur, Collins Communications, Inc. shall provide notification of the breach within seven (7) days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI").
 - b) Collins Communications, Inc. shall wait an additional seven (7) days from its government notice prior to notifying the affected customers of the breach.
 - c) Notwithstanding the provisions in subparagraph B above, Collins Communications, Inc. shall not wait the additional seven (7) days to notify customers if Collins Communications, Inc. determines that there is an immediate risk of irreparable harm to the customers.
 - d) Collins Communications, Inc. shall maintain records of discovered breaches for a period of at least two (2) years.
- 3) All employees will be trained as to when they are, and are not, authorized to use CPNI upon employment with Collins Communications Inc. and annually thereafter.
 - a) Specifically, Collins Communications, Inc. shall prohibit its personnel from releasing CPNI based upon a customer-initiated telephone call except under the following three (3) circumstances:
 - b) When the customer has pre-established a password.
 - c) When the information requested by the customer is to be sent to the customers address of record, or
 - d) When Collins Communications, Inc. calls the customer's telephone number of record and discusses the information with the party initially identified by customer when service was initiated.





COLLINS COMMUNICAITONS, INC's STATEMENT OF POLICY IN TREATMENT OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)

- e) Collins Communications, Inc. may use CPNI for the following purposes:
- i) To initiate, render, maintain, repair, bill, and collect for services;
 - ii) To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
 - iii) To provide inbound telemarketing, referral or administration services to the customer during a customer initiated call and with the customer's informed consent.
 - iv) To market additional services to customers that are within the same categories of service to which the customer already subscribes;
 - v) To market services formerly known as adjunct-to-basic services; and
 - vi) To market additional services to customers with the receipt of informed consent via the use of opt-in or opt-out, as applicable.
- 4) Prior to allowing access to Customer's individually identifiable CPNI to Collins Communications, Inc.'s joint ventures or independent contractors, Collins Communications, Inc. will require, in order to safeguard that information, their entry into both confidentiality agreements that ensure compliance with this Statement and shall obtain opt-in consent from a customer prior to disclosing the information. In addition, Collins Communications, Inc. requires all outside Dealers and Agents to acknowledge and certify that they may only use CPNI for the purpose for which that information has been provided.
- a) Collins Communications, Inc. requires express written authorization from the customer prior to dispensing CPNI to new carriers, except as otherwise required by law.
 - b) Collins Communications, Inc. does not market, share or otherwise sell CPNI information to any third party.
 - c) Collins Communications, Inc. maintains a record of its own and its affiliate's sales and marketing campaigns that use Collins Communications, Inc.'s customers' CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
 - d) Prior to the commencement of a sales or marketing campaign that utilizes CPNI, Collins Communications, Inc. establishes the status of a customer's CPNI approval. The following sets forth the procedure followed by Collins Communications, Inc.
 - i) Prior to any solicitation for customer approval, Collins Communications, Inc. will notify customers of their right to restrict the use of, disclosure of, and access to their CPNI;





**COLLINS COMMUNICAITONS, INC's STATEMENT OF POLICY IN TREATMENT OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)**

- ii) Collins Communications, Inc. will use opt-in approval for any instance in which Collins Communications, Inc. must obtain customer approval prior to using, disclosing, or permitting access to CPNI;
 - iii) A customer's approval or disapproval remains in effect until the customer revokes or limits such approval or disapproval;
 - iv) Records of approvals are maintained for at least one year;
 - v) Collins Communications, Inc. provides individual notice to customers when soliciting approval to use, disclose or permit access to CPNI; and,
 - vi) The content of Collins Communications, Inc. CPNI notices comply with FCC rule 64.2008(c).
- 5) Collins Communications, Inc. has implemented a system to obtain approval and informed consent from its customers prior to the use of CPNI for marketing purposes. This system allows for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI.
- 6) Collins Communications, Inc. has a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and will maintain compliance records for at least one year. Specifically, Collins Communications, Inc.'s sales personnel will obtain express approval of any proposed outbound marketing request for customer approval of the use of CPNI by The General Counsel of Collins Communications, Inc.
- 7) Collins Communications, Inc. notifies customers immediately of any account changes, including address of record, authentication, online account and password related changes.
- 8) Collins Communications, Inc. may negotiate alternative authentication procedures for services that Collins Communications, Inc. provides to business customers that have a dedicated account representative and a contract that specifically addresses Collins Communications, Inc.'s protection of CPNI.
- 9) Collins Communications, Inc. is prepared to provide written notice within five (5) business days to the FCC of any instance where the opt-in mechanisms do not work properly to such a degree that customer's inability to opt-in is more than anomaly.

